

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

MDL No. 2804

THIS DOCUMENT RELATES TO:

Master File No.  
17-md-2804

All Cases Listed on Attached Chart at  
Exhibit D

Honorable Dan A. Polster

**MASTER MOTION FOR EXTENSION OF TIME  
FOR THIRD PARTY PAYORS TO PRODUCE PLAINTIFF FACT SHEETS  
AND CORRESPONDING DOCUMENTS AND DATA**

Based on recent guidance from Special Master David R. Cohen, the Plaintiffs' Executive Committee ("PEC"), through James R. Dugan, II, the Third Party Payor ("TPP") Chair on the PEC, hereby moves the Court for an extension of time for certain TPPs to comply with the Court's Order Amending TPP Bellwether Process, dated June 30, 2023 (ECF No. 5097). That Order requires all TPPs that did not dismiss their actions by July 7, 2023 to complete the agreed-upon Plaintiff Fact Sheet by September 5, 2023. The bases for the extensions and the relief sought are set forth in the accompanying Memorandum and exhibits thereto.

The undersigned respectfully requests that the Court grant the Master Motion.

Dated: September 1, 2023

Respectfully submitted,

/s/ James R. Dugan, II  
James R. Dugan, II  
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*Member of the Plaintiffs' Executive Committee  
and Third Party Payor Chair*

**CERTIFICATE OF SERVICE**

I, James R. Dugan, hereby certify that this document was electronically filed with the Clerk of the Court for the Northern District of Ohio by using the CM/ECF System, which will provide notification of such filing on all registered CM/ECF users and electronic copies will be sent to those indicated as non-registered ECF participants on this 1<sup>st</sup> day of September, 2023.

Dated: September 1, 2023

/s/ James R. Dugan  
James R. Dugan